



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

February 17, 2021

MEMO ENDORSED

USDC SDNY
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ELECTRONICALLY FILED
DOC#:
DATE FILED: 2/18/2021

VIA ECF

The Honorable Andrew L. Carter Jr.
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Rahul Manchanda v. Internal Revenue Service*, 20 Civ. 10745 (ALC)

Dear Judge Carter:

This Office represents Defendants in the above-referenced action in which Plaintiff seeks injunctive relief and monetary damages for alleged violations of the Internal Revenue Code ("IRC") and the Federal Tort Claims Act ("FTCA"). Pursuant to the Court's February 8, 2021 Order (ECF No. 25), the parties jointly provide this status report to inform the Court that counsel for the parties met and conferred regarding their outstanding disputes, including during a telephone conversation on February 9. Despite the parties' best efforts, however, we have been unable to resolve this matter.

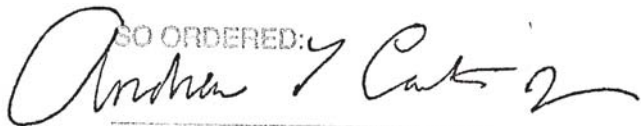
The parties therefore respectfully propose the following schedule:

- Plaintiff to file any amended complaint on or before March 17, 2021
- Defendants' answer or motion to dismiss to be filed on or April 14, 2021;
- Plaintiff's opposition to a motion to dismiss to be filed on or before May 5, 2021;
- Defendants' reply in support of a motion to dismiss to be filed on or before May 19, 2021.

We thank the Court for its consideration.

Respectfully,

AUDREY STRAUSS
United States Attorney

SO ORDERED: 

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE
Dated: 2/18/2021

By: /s/ Jeffrey Oestericher
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